



**Lowenstein
Sandler**

Scott B. McBride
Partner

One Lowenstein Drive
Roseland, New Jersey 07068

T: (973) 597-6136
F: (973) 597-2400
E: smcbride@lowenstein.com

May 18, 2023

VIA ECF

Hon. Denise L. Cote, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Granted.
Denise Cote
5/18/23

Re: SEC v. Joanna Lanni, Civil No. 22-4736 (DLC) (SLC)

Dear Judge Cote:

This firm is counsel to Defendant Joanna Lanni ("Ms. Lanni") in the above-referenced matter. Pursuant to Rule 1(E) of Your Honor's Individual Rules, we write on behalf of Ms. Lanni, joined by and with the consent of Karen Rosenberger ("Ms. Rosenberger," and, together with Ms. Lanni, "Defendants"), and with the consent of the SEC, to request an extension of the deadline for Defendants to identify rebuttal experts and disclose their expert testimony from Friday, May 19, 2023 (*see* ECF 45 ¶ 4) to Tuesday, May 23, 2023. For reasons related to an ongoing indemnification dispute with Synchronoss Technologies, Inc., Ms. Lanni was just, in the past five days, given approval to contract with her own accounting expert. As a result, Ms. Lanni requests a brief extension to ensure her newly retained expert can provide at least an abbreviated report to the SEC. Ms. Rosenberger joins in this extension request.

Ms. Lanni, with the consent of Ms. Rosenberger and the SEC, also respectfully requests a one-week extension of the expert discovery deadline from June 16, 2023 (*see id.* ¶ 5) to June 23, 2023. That way, the parties can review the expert disclosures, take expert testimony, and review any additional documents produced during the expert discovery period.

This is the first request to extend the expert discovery deadline. As indicated, both the SEC and Ms. Rosenberger consent to the brief extensions requested in this Letter. This request will not change any other deadlines set forth in the Pretrial Scheduling Order.

Hon. Denise L. Cote, U.S.D.J.
Page 2

May 18, 2023

We thank the Court for its consideration of this matter and are available at Your Honor's convenience should the Court wish to discuss this request.

Respectfully submitted,

/s/ Scott B. McBride
Scott B. McBride
Lowenstein Sandler LLP
1251 Avenue of the Americas
New York, New York 10020
smcbride@lowenstein.com
Tel: (973) 597-6136

cc: All counsel of record (via ECF)